

1 Laurence M. Rosen, Esq. (SBN 219683)
2 THE ROSEN LAW FIRM, P.A.
3 355 South Grand Avenue, Suite 2450
4 Los Angeles, CA 90071
5 Telephone: (213) 785-2610
6 Facsimile: (213) 226-4684
7 Email: lrosen@rosenlegal.com

8 *Counsel for Plaintiffs and the Class*

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 In re Silver Wheaton Corp. Securities
12 Litigation

Master File No. 2:15-cv-05146-
CAS-PJWx
c/w 15-cv-5173-CAS(PJWx)

13 CLASS ACTION

14 **STIPULATION FOR STAY**
15 **PENDING DOCUMENTATION OF**
16 **SETTLEMENT**

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19 WHEREAS, on December 4, 2019, the Parties attended a mediation before the
20 Hon. Layn R. Phillips (ret.) (“Mediation”);

21 WHEREAS, at the Mediation, the Parties reached a proposed class-wide
22 settlement in principle (“Settlement”);

23 WHEREAS, the Parties are in the process of finalizing a Memorandum of
24 Understanding embodying the principal terms of the Settlement;

25 WHEREAS, the Settlement requires Court approval; and
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1 WHEREAS, the Parties need time to draft a Stipulation of Settlement and
2 exhibits thereto to submit to the Court in connection with a motion for preliminary
3 approval of the Settlement:

4 IT IS HEREBY STIPULATED, subject to the approval of the Court, by and
5 between the parties, through their undersigned counsel of record as follows:

- 6 1. All deadlines in this Action are stayed until January 10, 2020;
- 7 2. The deadlines for opposition and reply briefs regarding Plaintiffs'
8 Motion for Partial Judgment on the Pleadings shall be vacated;
- 9 3. The hearing date for Plaintiffs' Motion for Partial Judgment on the
10 Pleadings shall be taken off calendar;
- 11 4. Plaintiffs shall file their Motion for Preliminary Approval of Settlement
12 on or before January 10, 2020.

13 IT IS SO STIPULATED.
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1 Dated: December 10, 2019

THE ROSEN LAW FIRM, P.A.

2 By: /s/ Laurence M. Rosen

3 Laurence M. Rosen

4 355 S. Grand Avenue, Suite 2450

5 Los Angeles, CA 90071

6 Telephone: (213) 785-2610

7 Facsimile: (213) 226-4684

8 Email: lrosen@rosenlegal.com

9 Counsel for Plaintiffs and the Class

10
11 Dated: December 10, 2019

Respectfully submitted,

12 **WILSON SONSINI GOODRICH & ROSATI**

13 Professional Corporation

14 By: /s/ Jerome F. Birn, Jr.

15 Jerome F. Birn, Jr.

16 650 Page Mill Road

17 Palo Alto, CA 94304-1050

18 Telephone: (650) 493-9300

19 Facsimile: (650) 565-5100

20 Email: jbirn@wsgr.com

21 **WILSON SONSINI GOODRICH & ROSATI**

22 Professional Corporation

23 Barry M. Kaplan

Gregory L. Watts

24 701 Fifth Avenue Suite 5100

Seattle, WA 98104-7098

25 Telephone: (206) 447-0900

26 Facsimile: (206) 883-2699

27 Email: bkaplan@wsgr.com

28 Email: gwatts@wsgr.com

Attorneys for the Silver Wheaton Defendants

Dated: December 10, 2019

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Alexander K. Mircheff
Alexander K. Mircheff

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: (213) 229-7000
Facsimile: (213) 229-7520
Email: amircheff@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

Lee G. Dunst
Benjamin S. Mishkin
Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035
Email: ldunst@gibsondunn.com
Email: bmishkin@gibsondunn.com

Attorneys for Defendant Deloitte LLP

1 ATTESTATION OF CONCURRENCE IN FILING

2 Pursuant to Local Rule 5-4.3.4 of the United States District Court for the
3 Central District of California, I attest that Counsel for Plaintiffs and the Class,
4 Counsel for Deloitte, and Counsel for Defendants Silver Wheaton, Randy
5 Smallwood, Peter Barnes, and Gary Brown have authorized the filing of this
6 document.
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8 /s/ Laurence M. Rosen

9 Laurence M. Rosen
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CERTIFICATE OF SERVICE

I, Laurence Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney at The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On December 10, 2019, I electronically filed the following STIPULATION FOR STAY PENDING DOCUMENTATION OF SETTLEMENT with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to counsel of record.

Executed on December 10, 2019

/s/ Laurence M. Rosen

Laurence M. Rosen